Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.¹

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the Commonwealth and ERS.

ORDER GRANTING FIVE HUDNRED TWENTY-FIFTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR WHICH THE DEBTORS ARE NOT LIABLE

Upon the Five Hundred Twenty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims for which the Debtors Are Not Liable [ECF No. 22258] (the "Five Hundred Twenty-Fifth Omnibus Objection")² of the Commonwealth of Puerto Rico

The Debtors in the Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Twenty-Fifth Omnibus Objection.

(the "Commonwealth") and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS," and together with the Commonwealth, the "Debtors"), dated September 16, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Five Hundred Twenty-Fifth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Twenty-Fifth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Twenty-Fifth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled "Claims to be Disallowed" in Exhibit A to the Five Hundred Twenty-Fifth Omnibus Objection (collectively, the "Claims to Be Disallowed") having been found to be claims for which neither the Commonwealth nor any other Title III debtor is liable; and the Court having determined that the relief sought in the Five Hundred Twenty-Fifth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Twenty-Fifth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Twenty-Fifth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be
Disallowed as expunged on the official claims register in the Title III Cases; and it is further

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ORDERED that this Order resolves Docket Entry No. 22258 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated:

Honorable Judge Laura Taylor Swain United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Twenty-Fifth Omnibus Objection

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT		
1	ALICEA COLON, LILLIAM I. PO BOX 285 PUNTA SANTIAGO, PR 00741	06/28/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	137384	\$57,807.07*		
	Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.							
	Claim #137384 also contained on Exhibit A to the 337th Omnibu	us Claims Objection for l	Reclassified Claims.					
2	BALBIN PADILLA, CYNTHIA EB-5 CALLE TILO URB. LOS ALMENDROS BAYAMON, PR 00961	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	154211	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the lit ("Acevedo Camacho"). However, based on documentation subnithere is therefore no basis for claimant to assert liabilities associated were in fact a plaintiff in that litigation, the claim would be duplicating to captioned Acevedo Camacho. Claim #154211 also contributed in the contribute of the contribut	nitted by the attorney rep ated with that litigation a licative of Claim nos. 320	oresenting all claimants in the gainst the Commonwealth, I 044 and 103072, the master p	e litigation, Claimant is not a named pla HTA, ERS, or any other Title III debtor. proof of claims filed on behalf of all plai	intiff in that litigation, a Further, even if Claima	nd int		
3	BARBOSO AYALA, MARILYN N HC 3 BOX 10368 SAN GERMAN, PR 00683	05/09/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	12567	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the lit KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et a documentation submitted by the attorneys representing all plaint to assert liabilities associated with either litigation against the Colitigation, the claim would be duplicative of the master proofs of	ul. v. Department of Tran iffs in those litigations, Commonwealth, HTA, ER	sportation & Public Works, Claimant is not a named plain S, or any other Title III debto	Case No. KAC-2005-5021 ("Abrams Dintiff in either litigation, and there is theror. Further, even if Claimant were in fac	az"). However, based o efore no basis for Claim et a plaintiff in either			
	Claim #12567 also contained on Exhibit A to the 351st Omnibus	Claims Objection for Pa	artially Disallowed Claims.					

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4	HEREDIA CRUZ, MARIA M			DEBTOR	CLAIM#	AMOUNT
	RR 7 BOX 6956 SAN JUAN, PR 00926	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	30335	Undetermined*
	Reason: Claim purports to assert liabilities associated with the liti ("Acevedo Camacho"). However, based on documentation subm there is therefore no basis for claimant to assert liabilities associate were in fact a plaintiff in that litigation, the claim would be duplicating the litigation captioned Acevedo Camacho. Claim #30335 also contains.	itted by the attorney repr ted with that litigation ago cative of Claim nos. 320	esenting all claimants in the gainst the Commonwealth, I 44 and 103072, the master p	e litigation, Claimant is not a named plai HTA, ERS, or any other Title III debtor. proof of claims filed on behalf of all plain	ntiff in that litigation, and Further, even if Claimant	
5	HERNANDEZ ROSADO, SECUNDINO 2 CALLE BRISAS DEL MAR AGUADA, PR 00602	05/14/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	14843	Undetermined*
	Reason: Claim purports to assert liabilities associated with the liti KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al documentation submitted by the attorneys representing all plaintit to assert liabilities associated with either litigation against the Collitigation, the claim would be duplicative of the master proofs of	l. v. Department of Trans ffs in those litigations, C mmonwealth, HTA, ERS	portation & Public Works, of laimant is not a named plair s, or any other Title III debto	Case No. KAC-2005-5021 ("Abrams Diantiff in either litigation, and there is there or. Further, even if Claimant were in fac	az"). However, based on fore no basis for Claimar t a plaintiff in either	
	Claim #14843 also contained on Exhibit A to the 351st Omnibus	Claims Objection for Par	rtially Disallowed Claims.			
6	LEBRON FLORES, AMANLYS URB. VILLA ANA CALLE ROBERTO MOJICA D-15 JUNCOS, PR 00777	05/22/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	24607	Undetermined*
	Reason: Claim purports to assert liabilities associated with the litit However, based on documentation submitted by the attorney rep basis for claimant to assert liabilities associated with that litigation in that litigation, the claim would be duplicative of Claim no. 152 Colon. Because this objection does not constitute an objection to other grounds whatsoever. Claim #24607 also contained on Exhibit A to the 367th Omnibus	resenting all claimants ir n against the Commonw 372, the master proof of the other portion of the c	a the litigation, Claimant is a ealth, HTA, ERS, or any oth claim filed on behalf of all claim, the Debtors' reserve to	not a named plaintiff in that litigation, ar ner Title III debtor. Further, even if Clai plaintiffs associated with the litigation c	nd there is therefore no mant were in fact a plaint aptioned Maldonado	iff

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT		
7	MARRERO, ENID OCASIO PO BOX 1464 COROZAL, PR 00783	05/21/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18276	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.							
	Claim #18276 also contained on Exhibit A to the 351st Omnibus	Claims Objection for Par	rtially Disallowed Claims.					
8	MARTINEZ SERRANO, MARIA PO BOX 552 JUANA DIAZ, PR 00795	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	36540	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho. Claim #36540 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims and the 526th Omnibus Claims Objection for Disallowed Claims.							
9	MARTINEZ SERRANO, MARIA M. PO BOX 552 JUANA DIAZ, PR 00795	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	38520	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the lit ("Acevedo Camacho"). However, based on documentation submithere is therefore no basis for claimant to assert liabilities associated were in fact a plaintiff in that litigation, the claim would be duplicating litigation captioned Acevedo Camacho. Claim #38520 also contain Claims Objection for Disallowed Claims.	nitted by the attorney reprited with that litigation ago cative of Claim nos. 3204	esenting all claimants in the gainst the Commonwealth, F 44 and 103072, the master p	litigation, Claimant is not a named plai ITA, ERS, or any other Title III debtor. roof of claims filed on behalf of all plain	ntiff in that litigation, an Further, even if Claiman ntiffs associated with the	nd nt		

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Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT	
10	MARTY TROCHE, HIRAM L 48 CALLE SALVADOR BRAU CABO ROJO, PR 00623	04/16/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	7442	Undetermined*	
	Reason: Claim purports to assert liabilities associated with the KAC1990-0487 ("Pérez Colón"). However, based on docum litigation, and there is therefore no basis for claimant to assert even if Claimant were in fact a plaintiff in that litigation, the cassociated with the litigation captioned Pérez Colón. Because to the remaining portion of the claim on any other grounds who Claim #7442 also contained on Exhibit A to the 351st Omnibu	entation submitted by the a liabilities associated with a laim would be duplicative this objection does not con atsoever.	attorney representing all clain that litigation against the Co of Claim nos. 30851 and 10 astitute an objection to the ot	mants in the litigation, Claimant is not a mmonwealth, HTA, ERS, or any other Ti 4175, the master proof of claims filed on	named plaintiff in that itle III debtor. Further, behalf of all plaintiffs	:t	
11	MENDEZ LARACUENTE, RAMON 61 CALLE MENDEZ VIGO APARTAMENTO 5 PONCE, PR 00730	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	14449	Undetermined*	
	Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón. Claim #14449 also contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims, the 524th Omnibus Claims Objection for Disallowed Claims and the 526th Omnibus Claims Objection for Disallowed Claims.						
12	MENDEZ LARACUENTE, RAMON 61 CALLE MENDEZ VIGO APARTAMENTO 5 PONCE, PR 00730	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18494	Undetermined*	
	Reason: Claim purports to assert liabilities associated with the KAC-2009-0809 ("Beltrán Cintrón"). However, based on doc litigation, and there is therefore no basis for claimant to assert even if Claimant were in fact a plaintiff in that litigation, the cassociated with the litigation captioned Beltrán Cintrón. Claim	umentation submitted by the liabilities associated with the laim would be duplicative	he attorney representing all of that litigation against the Co of Claim nos. 179140 and 9	claimants in the litigation, Claimant is no mmonwealth, HTA, ERS, or any other To 3199, the master proof of claims filed on	t a named plaintiff in tha itle III debtor. Further, behalf of all plaintiffs	at	

Omnibus Claims Objection for Disallowed Claims.

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT		
13	QUINONES MALDONADO, CARMEN D. URB JARDS DE COUNTRY CLUB CJ28 CALLE 147 CAROLINA, PR 00983	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	24924	\$90,908.16*		
	Reason: Claim purports to assert liabilities associated with the litt KAC-2009-0809 ("Beltrán Cintrón"). However, based on docum litigation, and there is therefore no basis for claimant to assert lia even if Claimant were in fact a plaintiff in that litigation, the claim associated with the litigation captioned Beltrán Cintrón. Claim #2 Omnibus Claims Objection for Disallowed Claims.	nentation submitted by the bilities associated with the mould be duplicative of	attorney representing all cla at litigation against the Com Claim nos. 179140 and 931	aimants in the litigation, Claimant is not monwealth, HTA, ERS, or any other Titl 199, the master proof of claims filed on b	a named plaintiff in t le III debtor. Further behalf of all plaintiffs	,		
14	RAMOS RODRIGUEZ, DIANA E. URB BRISAS DEL PRADO 1730 CALLE GARZA SANTA ISABEL, PR 00757-2563	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	122250-2	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the litigation captioned Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 50221 and 104127, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Abrams Diaz. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.							
15	RIVERA IRIZARRY, MARIA URB LOS REYES 91 CALLE BELEN JUANA DIAZ, PR 00795	05/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	33588	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the lit ("Acevedo Camacho"). However, based on documentation subm there is therefore no basis for claimant to assert liabilities associa were in fact a plaintiff in that litigation, the claim would be duplilitigation captioned Acevedo Camacho. Claim #33588 also conta Claims Objection for Disallowed Claims.	itted by the attorney repreted with that litigation aga cative of Claim nos. 3204	esenting all claimants in the ainst the Commonwealth, H 4 and 103072, the master pr	litigation, Claimant is not a named plain TA, ERS, or any other Title III debtor. F oof of claims filed on behalf of all plaint	tiff in that litigation, Further, even if Claim tiffs associated with t	and ant		

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT		
16	RODRIGUEZ RAMOS, MIGDALIA PMB 249 PO BOX 1810 MAYAGUEZ, PR 00681	05/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25257	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the liting KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al documentation submitted by the attorneys representing all plaintiff to assert liabilities associated with either litigation against the Corlitigation, the claim would be duplicative of the master proofs of contained on Exhibit A to the 351st Omnibus Claims Objection for	. v. Department of Transp ffs in those litigations, Cl mmonwealth, HTA, ERS, claim filed on behalf of al	portation & Public Works, C aimant is not a named plain , or any other Title III debto Il plaintiffs associated with	Case No. KAC-2005-5021 ("Abrams Dia: tiff in either litigation, and there is therefor. Further, even if Claimant were in fact	z"). However, based of fore no basis for Claim a plaintiff in either	ant		
17	RODRIGUEZ RODRIGUEZ, SONIA PO BOX 1604 JUANA DIAZ, PR 00795-5501	05/23/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	36686	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón. Claim #36686 also contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims and the 524th Omnibus Claims Objection for Disallowed Claims.							
18	SANTIAGO RENTA, ANAIDA M HC 5 BOX 5624 JUANA DIAZ, PR 00795	05/17/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	14659	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the liti KAC-2009-0809 ("Beltrán Cintrón"). However, based on docume litigation, and there is therefore no basis for claimant to assert liabe even if Claimant were in fact a plaintiff in that litigation, the claim associated with the litigation captioned Beltrán Cintrón. Claim #1 Omnibus Claims Objection for Disallowed Claims.	entation submitted by the continuous submitted with the continuous submitted with the continuous submitted by the continuous submitted submitted by the continuous submitted submitted submitted submitted submitted submitted sub	e attorney representing all cl at litigation against the Com f Claim nos. 179140 and 93	aimants in the litigation, Claimant is not amonwealth, HTA, ERS, or any other Tit 199, the master proof of claims filed on b	a named plaintiff in the le III debtor. Further, pehalf of all plaintiffs	at		

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT		
19	SANTIAGO RENTA, ANAIDA M HC 5 BOX 5624 JUANA DIAZ, PR 00795	05/17/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	15717	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the litigations captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho") and Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Acevedo Camacho and Beltrán Cintrón litigations. Claim #15717 also contained on Exhibit A to the 526th Omnibus Claims Objection for Disallowed Claims.							
20	SANTIAGO RODRIGUEZ, SERAFIN JARDIROS D-8 CALLE 6 SANTA ISABOL, PR 00757	06/05/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	47370	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the litigation captioned Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Rodriguez"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colon. Because this objection does not constitute an objection to the other portion of the claim, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.							
21	SANTIAGO SOTO, VIVIAN BOX 418 SANTA ISABEL, PR 00757	04/19/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	5863	\$8.00*		
	Reason: Claim purports to assert liabilities associated with the lit KAC1990-0487 ("Pérez Colón"). However, based on documen litigation, and there is therefore no basis for claimant to assert lia even if Claimant were in fact a plaintiff in that litigation, the claim associated with the litigation captioned Pérez Colón.	tation submitted by the at abilities associated with the	ttorney representing all clain hat litigation against the Cor	nants in the litigation, Claimant is not a monomealth, HTA, ERS, or any other T	named plaintiff in that itle III debtor. Further,			
	Claim #5863 also contained on Exhibit A to the 351st Omnibus 0	Claims Objection for Part	tially Disallowed Claims.					

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT		
22	SANTIAGO VIENTOS, JOSE A HC 02 BOX 11203 LAS MARIAS, PR 00670	04/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	7311	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations. Claim #7311 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims.							
23	SILVA BERNIER, JOSE V. P.O. BOX 1703 GUAYAMA, PR 00785	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	70744	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations. Because this objection does not constitute an objection to the other portion of the claim, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.							
24	TORRES LOPEZ, IVETTE G URB. BRISAS DEL PRADO BOX 2008 SANTA ISABEL, PR 00757	05/17/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	13765	Undetermined*		
	Reason: Claim purports to assert liabilities associated with the litig ("Acevedo Camacho") and Francisco Beltrán Cintrón et al. v. Pue documentation submitted by the attorneys representing all plaintif to assert liabilities associated with either litigation against the Corlitigation, the claim would be duplicative of the master proofs of c #13765 also contained on Exhibit A to the 367th Omnibus Claims	rto Rico Department of F fs in those litigations, Cla nmonwealth, HTA, ERS, laim filed on behalf of al	amily Affairs, Case No. KA aimant is not a named plaint or any other Title III debtor I plaintiffs associated with the	C-2009-0809 ("Beltrán Cintrón"). Howe iff in either litigation, and there is therefo Further, even if Claimant were in fact a he Acevedo Camacho and Beltrán Cintrón	ver, based on re no basis for Claima plaintiff in either l litigations . Claim			

Case:17-03283-LTS Doc#:23372-1 Filed:01/25/23 Entered:01/25/23 19:19:58 Desc: Proposed Order Page 14 of 14 Five Hundred Twenty-Fifth Omnibus Objection

	NAME	DATE FILED	CASE NUMBER	DEBTOR	AS CLAIM#	SSERTED CLAIM AMOUNT
25	TORRES LOPEZ, IVETTE G URB. BRISAS DEL PRADO BOX 2008 SANTA ISABEL, PR 00757	05/17/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	13935	Undetermined*
	Reason: Claim purports to assert liabilities associated with the li ("Acevedo Camacho") and Francisco Beltrán Cintrón et al. v. Podocumentation submitted by the attorneys representing all plaint to assert liabilities associated with either litigation against the Clitigation, the claim would be duplicative of the master proofs of #13935 also contained on Exhibit A to the 526th Omnibus Claim	uerto Rico Department of ciffs in those litigations, Commonwealth, HTA, ER f claim filed on behalf of	f Family Affairs, Case No. K Claimant is not a named plain S, or any other Title III debto all plaintiffs associated with	AC-2009-0809 ("Beltrán Cintrón"). Hontiff in either litigation, and there is there or. Further, even if Claimant were in fac	wever, based on efore no basis for Claimant et a plaintiff in either	t
26	VAZQUEZ PAREDES, NEIZA H PO BOX 1754 YABUCOA, PR 00767	07/05/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	111363	Undetermined*
	Reason: Claim purports to assert liabilities associated with the li KAC-2009-0809 ("Beltrán Cintrón"). However, based on docur litigation, and there is therefore no basis for claimant to assert li even if Claimant were in fact a plaintiff in that litigation, the cla	mentation submitted by the abilities associated with the	ne attorney representing all chat litigation against the Cor	laimants in the litigation, Claimant is no nmonwealth, HTA, ERS, or any other T	ot a named plaintiff in that itle III debtor. Further,	
	associated with the litigation captioned Beltrán Cintrón.			,		
27		06/06/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	66761	Undetermined*
27	VELAZQUEZ LUCIANO, KEYLA M #76 URB. ALTURAS SABANERAS	tigations captioned Juan al. v. Department of Transiffs in those litigations, commonwealth, HTA, ER	17 BK 03283-LTS Pérez Colón et al. v. Puerto sportation & Public Works, Claimant is not a named plain S, or any other Title III debto	Commonwealth of Puerto Rico Rico Department of Transportation & Pu Case No. KAC-2005-5021 ("Abrams Di ntiff in either litigation, and there is there or. Further, even if Claimant were in face	ublic Works, Case No. az"). However, based on efore no basis for Claimant at a plaintiff in either	
27	VELAZQUEZ LUCIANO, KEYLA M #76 URB. ALTURAS SABANERAS SABANA GRANDE, PR 00637-1603 Reason: Claim purports to assert liabilities associated with the li KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et documentation submitted by the attorneys representing all plaint to assert liabilities associated with either litigation against the Co	tigations captioned Juan al. v. Department of Tran iffs in those litigations, Commonwealth, HTA, ER f claim filed on behalf of	17 BK 03283-LTS Pérez Colón et al. v. Puerto sportation & Public Works, Claimant is not a named plair S, or any other Title III debto all plaintiffs associated with	Commonwealth of Puerto Rico Rico Department of Transportation & Pu Case No. KAC-2005-5021 ("Abrams Di ntiff in either litigation, and there is there or. Further, even if Claimant were in face	ublic Works, Case No. az"). However, based on efore no basis for Claimant at a plaintiff in either	